REMARKS

Claims 1-37, 40, 42-52, 54, 56 , 57, 59-74, 76, 78-80, 82, 87-89, 91, 93, 94, 96-108, 110 and 113-116 are presented for consideration, with Claims 1, 11, 20, 26, 31,32,51,52, 65, 73, 74, 78, 79,80, 96, 97, 108, 113, 114, 115 and 116 being independent.

The independent claims have been amended to further distinguish Applicants' invention from the cited art.

The amendments to the claims were not presented earlier as it was believed that the previously presented claims would be found allowable. This Amendment does not add any additional claims. Moreover, the Examiner's familiarity with the subject matter of the present application will allow an appreciation of the significance of the amendments herein without undue expenditure of time and effort. Finally, the Amendment does not raise new issues requiring a significant amount of further consideration or search. Accordingly, it is believed that entry of the Amendment is appropriate.

All of the claims stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Tlaskal '589. This rejection is respectfully traversed.

Applicants' invention as set forth in representative Claim 33 relates to a method of processing an expression tree, with the expression tree representing a compositing expression for compositing an image and comprising a plurality of nodes, each node of the expression tree representing an object of the image or an operation for combining sub-expressions of the compositing expression. The method includes the steps of determining an opacity region representation for each node of the expression tree, the opacity region comprising one or more of three predetermined values identifying whether a corresponding region of an object represented by the node is an opaque region, a transparent region or a partially transparent

region such that the opacity region representation simultaneously represents each opaque region, transparent region and partially transparent region of the object represented by the node, and determining an obscurance region representation for at least one node of the expression tree based on an analysis of the opacity region representation associated with at least one node. As amended, Claim 33 recites that the obscurance region representation is determined such that, for the image, the at least one node simultaneously comprises both the opacity region representation and the obscurance region representation, with the obscurance region representation being separate from the opacity region representation of the at least one node, and the obscurance region representation being assigned one or more of a plurality of further predetermined values distinctly identifying whether a corresponding region of at least one object is visible in the image. An additional step includes using the separate obscurance region representations determined for the expression tree to optimize the processing of the expression tree in compositing the image.

In accordance with Applicants' claimed invention, an efficient and highly effective method of processing an expression tree is provided. Support for the claim amendments can be found, for example, on page 16, line 20, *et. seq.*, of the specification.

The patent to Tlaskal has been thoroughly discussed in the previous Amendment of March 1, 2005, and those comments are incorporated herein by reference.

In contrast to Applicants' claimed invention, however, Tlaskal is not understood to teach or suggest, among other features, determining an opacity region representation for each node of an expression tree, and determining an obscurance region representation of at least one node of the expression tree that simultaneously comprises both the

opacity region representation and the obscurance region representation. As understood, Tlaskal discloses, for a static rendering of an image, starting at the bottom of an expression tree and working its way up towards the root, and for a dynamic rendering of an image region groups (containing regions and proxies) are generated in a similar manner (see column 21, line 35 through column 22, line 41). In this regard, Tlaskal is read to disclose the construction of only one region group for each node, with that region group being updated in order to represent a new image. It is respectfully submitted, therefore, that Tlaskal cannot be said to teach or suggest providing at least one node simultaneously comprised of both an opacity region representation and a separate obscurance region representation.

It is respectfully submitted that the other independent claims, i.e., Claims 1, 11, 20, 26,3 1, 32, 51, 52, 65, 73, 74, 78. 79, 80, 96. 97, 108, 113, 114, 115 and 116, can be similarly distinguished from Tlaskal.

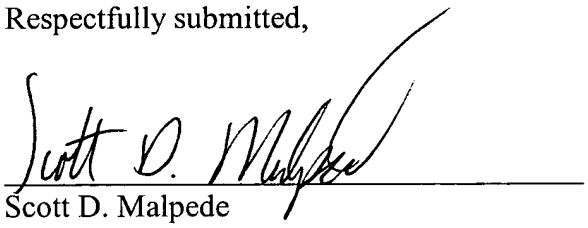
Accordingly, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. § 102(e) is respectfully requested.

Therefore, it is submitted that Applicants' invention as set forth in independent Claim 1, 11, 20, 26, 31, 32, 33, 51, 52, 65, 73, 74, 78, 79, 80, 96, 97, 108, 113, 114, 115 and 116 are patentable over the cited art. In addition, the dependent claims set forth additional features of Applicants' invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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